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6  
Attorney for Arian Bailey  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 ARIAN BAILEY,  
14 Defendant.

2:21-CR-00208-GMN-DJA

**STIPULATION TO DISMISS  
PETITION WITHOUT  
PREJUDICE**

15  
16 Pursuant to the Court's February 7, 2022, Minute Order, Christopher  
17 Chiou, Acting United States Attorney, and Simon F. Kung, Assistant United  
18 States Attorney, counsel for the United States of America, and Rene L.  
19 Valladares, Federal Public Defender, and Aden Kebede, Assistant Federal Public  
20 Defender, counsel for Arian Bailey, hereby submit the following stipulation.  
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1           1.       On September 2, 2021, Mr. Bailey admitted to the allegations in the  
2 original petition and addendum. The Court stayed sentencing for six months in  
3 order for Mr. Bailey to complete treatment and get back into compliance.

4           2.       Since that hearing, Mr. Bailey has only had negative tests and has  
5 stayed in compliance. He also successfully completed outpatient treatment  
6 through the Freedom House.

7           3.       The parties have agreed to dismiss the petition without prejudice  
8 and continue Mr. Bailey on his current term of supervision.

9           4.       The parties move to dismiss the petition and the addendum at this  
10 time. The parties request that the March 2, 2022, hearing be vacated because of  
11 the joint resolution.

12           DATED this 16<sup>th</sup> day of February 2022.

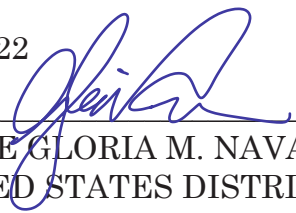
13           RENE L. VALLADARES  
14           Federal Public Defender

              CHRISTOPHER CHIOU  
              Acting United States Attorney

15           /s/ Aden Kebede  
16           By \_\_\_\_\_  
17           ADEN KEBEDE  
              Assistant Federal Public Defender

              /s/ Simon F. Kung  
              By \_\_\_\_\_  
              SIMON F. KUNG  
              Assistant United States Attorney

18           DATED this 17 day of February, 2022

19                               By:   
20                               JUDGE GLORIA M. NAVARRO  
21                               UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on February 16, 2022 he served an electronic copy of the above and foregoing, **STIPULATION TO DISMISS PETITION WITHOUT PREJUDICE**, by electronic service (ECF) to the person named below:

CHRISTOPHER CHIOU  
Acting United States Attorney  
SIMON F. KUNG  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/Brandon Thomas  
Federal Public Defender Employee